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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

PENSKE MEDIA CORPORATION,
dba PMC, a Delaware corporation,

Plaintiff,

v.

PROMETHEUS GLOBAL MEDIA,
LLC, a Delaware limited liability
company d/b/a
hollywoodreporter.com; and DOES 1
through 10, inclusive,

Defendants.

Case No.: CV 11-7560-JST (MRW)

Hon. Josephine Staton Tucker
Magistrate: Hon. Michael R. Wilner

**DISCOVERY MATTER:
DECLARATION OF ANTHONY
SBARDELLATI IN OPPOSITION
TO PLAINTIFF PENSKE MEDIA
CORPORATION'S
SUPPLEMENTAL MEMORANDUM**

**MEMORANDUM IN OPPOSITION
TO MOTION (filed concurrently)**

Action filed: September 14, 2011
Discovery Cut-off: November 9, 2012
Trial Date: July 9, 2013

1 I, Anthony Sbardellati, declare as follows:
2

3 1. I am a member of the bar of the State of California and an associate in
4 the law firm Sauer & Wagner LLP, counsel for defendant Prometheus Global
5 Media, LLC ("Prometheus") in the above-captioned litigation. I make this
6 declaration of my personal, firsthand knowledge and, if called and sworn as a
7 witness, I could and would testify competently thereto.
8

9 2. Attached hereto as Exhibit A is a true and correct copy of an email
10 that I received from Steven Stiglitz, counsel for Plaintiff Penske Media
11 Corporation ("Penske"), on Monday October 29, 2012.
12

13 3. Attached hereto as Exhibit B is a true and correct copy of an email
14 that I received from Mr. Stiglitz on Friday November 9, 2012.
15

16 4. Attached hereto as Exhibit C is a true and correct copy of an email
17 that Eve Wagner, a partner in my firm, sent to Mr. Stiglitz on Friday November 16,
18 2012.
19

20 I declare under penalty of perjury under the laws of the United States and
21 California that the foregoing is true and correct.
22

23 Executed on December 5, 2012, at Los Angeles, California
24

25 /s/ Anthony Sbardellati
26 Anthony Sbardellati
27
28